

SOLOMON E. GRESEN [SBN: 164783]
JOSEPH M LEVY [SBN: 230467]
LAW OFFICES OF RHEUBAN & GRESEN
15910 VENTURA BOULEVARD, SUITE 1610
ENCINO, CALIFORNIA 91436
TELEPHONE: (818) 815-2727
FACSIMILE: (818) 815-2737

2011 JUN -2 AM 10:23

Attorneys for Plaintiff, Steve Karagiosian

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

OMAR RODRIGUEZ; CINDY GUILLEN-
GOMEZ; STEVE KARAGIOSIAN;
ELFEGO RODRIGUEZ; AND JAMAL
CHILDS,

Plaintiffs,

-vs-

BURBANK POLICE DEPARTMENT; CITY
OF BURBANK; AND DOES 1 THROUGH
100, INCLUSIVE.

Defendants.

CASE NO.: BC 414 602

Assigned to: Hon. Joanne B. O'Donnell, Judge
Dept. 37

Complaint Filed: May 28, 2009

PLAINTIFF'S REPLY TO DEFENDANT'S
OPPOSITION TO PLAINTIFF'S MOTION *IN*
LIMINE NO. 6 TO PREVENT ALL
WITNESSES FROM WEARING POLICE
UNIFORMS IN THE PRESENCE OF THE
JURY

Final Status Conference:

DATE: June 8, 2011
TIME: 9:00 a.m.
DEPT: 37

Trial Date: June 8, 2011

BURBANK POLICE DEPARTMENT; CITY
OF BURBANK,

Cross-Complainants,

-vs-

OMAR RODRIGUEZ, and Individual,

Cross- Defendant.

6/1

1 **PLAINTIFF HAS MET AND CONFERRED IN COMPLIANCE WITH LOCAL RULES**

2 As stated in the Declaration of Steven M. Cischke accompanying Plaintiff's Motion *in*
3 *Limine* No. 6, on March 31, 2011, Mr. Cischke emailed a letter to Lawrence A. Michaels, counsel for
4 Defendant, in an attempt to meet and confer regarding Plaintiff's motions *in limine*. Nowhere in the
5 letter does it indicate that the motions discussed therein would only be filed in the Cindy Gomez
6 trial. The subject line references "*Rodriguez v. Burbank Police Department, et al.*" and not any of
7 the individual related cases. Plaintiff has not filed any motions in the Steve Karagiosian trial that
8 were not discussed in the March 31 letter. All of the motions *in limine* Plaintiff has filed with
9 respect to Plaintiff Steve Karagiosian's trial were discussed in the March 31, 2011. Those motions
10 were argued during a pre-trial conference for the Guillen-Gomez trial. Defendant argues in its
11 opposition to Plaintiff's Motion *in Limine* No. 6 that the court denied the motion with respect to the
12 Guillen-Gomez trial. Thus, it is clear that "the subject of the motion has been discussed with
13 opposing counsel," in compliance with local rules, and Defendant's argument that counsel has not
14 met and conferred with respect to the motion, and is guilty of fraud, is unfounded.

15
16 DATED: June 1, 2011

LAW OFFICES OF RHEUBAN & GRESEN

17
18 By: Steven M. Cischke
19 Steven M. Cischke
20 Attorneys for Plaintiff, Steve Karagiosian
21
22
23
24
25
26
27
28